IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Sabein Burgess, *

Plaintiff, *

vs. * Case No. 15-cv-00834-WDQ

Baltimore Police Department, et al. *

Defendants.

CONSENT MOTION FOR EXTENSION OF TIME FOR DEFENDANT MAYOR AND CITY COUNCIL OF BALTIMORE TO RESPOND TO COMPLAINT

The Mayor and City Council of Baltimore ("City"), a Defendant herein, files this Consent Motion for Extension of Time to Respond to the Complaint filed by Plaintiff Sabein Burgess ("Plaintiff"). The Court's electronic record reflects a due date of April 20, 2015 for the City's Answer. However, the City's counsel agreed to waive service of the Complaint under Federal Rule of Civil Procedure 4(d), which provides the City with 60 days to respond to the Complaint. Counsel for the City has consulted with counsel for Plaintiff, who has agreed that the time period for the City's response will be 60 days from April 8, 2015 or June 8, 2015. Counsel for the Baltimore Police Department ("BPD"), and counsel assigned by the BPD to represent the individual officers, have been consulted and agree with this request.

WHEREFORE, Defendant City respectfully requests that the Court issue an Order reflecting that the City shall file its responsive pleading in this case on or before June 8, 2015.

Respectfully submitted,

/s/

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Council of Baltimore

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 17th day of April 2015, I served the persons listed below via the Electronic Court Filing System of the United Stated District Court for the District of Maryland:

Steve Art, Esquire Gayle Horn, Esquire Jon Loevy, Esquire Loevy & Loevy 312 N. May Street, Suite 100 Chicago, IL 60607 Counsel for Plaintiff

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_____/s/ MICHAEL REDMOND